

Collins, Thomas N.
Paris, KY
Page 1 of 5



Kentucky Pioneer Integrated Gasification
Combined Cycle Demonstration Project
Draft Environmental Impact Statement
U.S. Department of Energy
National Energy Technology Laboratory

Written Comment Form

Must be received by January 4, 2002.

Dear Mr Spears,
I am writing you to express
my concerns about the proposed
gasification project.
The first thought that comes
to mind is, if gasification of
solid waste is such a good idea
and will provide so many benefits
to Kentucky, then why doesn't
New Jersey keep and gasify
their own waste? It'll not the
pollution generated by ground
transportation across multi states
add to the green-house effect and
(over)

Comment forms may be mailed to:
Mr. Roy Spears
U.S. Department of Energy
National Energy Technology Laboratory
3610 Collins Ferry Road
Morgantown, WV 26507-0880

Comment forms may be faxed to:
Mr. Roy Spears
(304) 285-4403

Comment No. 1

Issue Code: 16

Because of DOE's limited role in providing cost-shared funding for the proposed Kentucky Pioneer IGCC Demonstration Project, and because of advantages associated with the proposed location, DOE did not evaluate alternative sites for the proposed project. Site selection was governed primarily by benefits that Global Energy could realize. Global Energy preferred the proposed project site because the costs would be much higher and the environmental impacts likely much greater for an undisturbed area.

This project was first selected in 1993, with Duke Energy as the participant in partnership with an east coast utility. However, for various reasons, the siting for the project was changed to a site in Illinois. In 1999, Global Energy approached Duke and requested to take over the project. KPE, a subsidiary of Global Energy, entered into a power purchase agreement with East Kentucky Power Cooperative (EKPC) to buy the power from the Kentucky Pioneer facility. Because the current proposed site for the project would provide for demonstration of the BGL technology, and the power purchase agreement between KPE and EKPC would allow KPE to meet their repayment agreement with DOE, the partnership was found acceptable.

Comment No. 2

Issue Code: 06

Comment noted. Rail transport is the most economical and energy-efficient transportation method available for this project for fuel materials and marketable byproducts generated by the gasification process. Emissions per ton per mile for material transported by rail would be substantially less than comparable emissions associated with truck transport. Rail transport is clearly the preferred method for fuel materials and shipment of vitrified frit. Customers for sulfur produced by the sulfur recovery facility would determine whether shipment of that material is by rail or truck. All air impacts, including a discussion of greenhouse gas emissions and acid rain effects, are presented in Section 5.7, Air Resources, of the EIS.

Collins, Thomas N.
Paris, KY
Page 2 of 5

②
also acid rain that already
plagues the Eastern United States?
What is the environmental impact
in New Jersey that changes when
the vast amounts of solid waste
arrives in Kentucky?

As a Kentuckian, I have watched
outside interests use this state
for their own gain at our loss
for years - I am thinking about
strip mining. I have lived and
worked in Kentucky all my life
with the only time away from
home a four year stint in the
U.S. Navy. I have seen 3/4
of the rest of the world and
I have not found any place
better. Though I do not live
in the immediate area of the
proposed project, (30 miles away)
I have fished, boated and
camped at the confluence

Comment No. 3**Issue Code:22**

Comment noted. Reduced impacts as a result of removing the RDF
from the manufacturer site is beyond the scope of this EIS.

2/06
(cont.)

Comment No. 4**Issue Code:22**

Comment noted. The power generated by the Kentucky Pioneer IGCC
Demonstration Project will be used within Kentucky.

3/22

4/22

Collins, Thomas N.
Paris, KY
Page 3 of 5



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of the Red River and the Kentucky
River for twenty years. The fishing
stories I could tell you, the wild
life I have seen, the times
of peace and tranquility I
have spent there can have no
monetary value placed on them.
The solitude of this area is very
remarkable given its close proximity
to a large metropolitan population.
Other questions that I have
include, what will be the traffic
impact on highway 89 during construction.
This road is very busy during the
work week and school buses run

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Please use other side if more space is needed.

Comment No. 5

Issue Code: 10

Comment noted. Impacts to traffic levels along Kentucky Highway 89 are addressed in Section 5.11, Traffic and Transportation. As stated, during construction, 500 to 1,000 vehicle trips would occur along Kentucky Highway 89 at the beginning and end of the construction workday. The exact number would depend on the staffing levels required onsite. Construction schedules typically call for workers to be onsite relatively early in the morning to avoid morning schoolbus traffic, until early afternoon. The Transportation Division of the Clark County School Board indicates that schoolbuses utilize Kentucky Highway 89 when construction workers would be leaving the site. Section 5.11, Traffic and Transportation, has been modified to reflect the impacts of added vehicles on schoolbus usage.

4/22
(cont.)

The trucks would haul a maximum of 18 metric tons (20 tons) of cargo each, which would place the overall weight below the Kentucky-mandated maximum weight for Highway 89 of 36,288 kilograms (80,000 pounds) for a five-axle vehicle. The Kentucky Transportation Cabinet indicated any vehicle below that weight traveling along that road would not be expected to cause damage to the roadway. Should damage occur from vehicles carrying more than the maximum weight allowance, the operator of the truck, in this case KPE, would be responsible for any repairs to the road surface. Section 5.11, Traffic and Transportation, has been modified to address the concerns of damage to the local roads.

5/10

Collins, Thomas
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Page 4 of 5

(4)
up and down the road most of the year. Highway 89 is not a safe road at the best of times. What is the constitution of the waste pellets going to be? What is the quality control going to consist of? We are talking years and years of shipping with no assurance of stable regulation resources. If heavy metals, mercury PCB's - who knows what slips through, the damage is done. On the surface, it seems this project is being pushed through under the radar of the public eye. The limited availability of the environmental impact statement, the short and limited notification of the public and lack of placement of documents in the Clark County Court library, whether through oversight or ~~an~~ intentionally, remains a fact. Give this project a little breathing-

Comment No. 6**Issue Code: 16**

Chapter 3, Section 3.2.2.2, discusses the production and composition of the RDF pellets.

Comment No. 7**Issue Code: 21**

5/10 (cont.)
6/16
7/21
8/12
The Final PSD/Title V Air Permit, issued by the Kentucky Division for Air Quality on June 7, 2001, requires continuous emissions monitors for NO_x, SO_x, CO, O₂, and PM₁₀. Annual stack tests for all pollutants with emission limits established by the permit are also required. The KPDES permit, which will be obtained at least 180 days prior to the commencement of construction, will also have effluent limits and monitoring requirements established by state regulations. Along with the required monitoring under the permit, KPE would also monitor the levels of biological and chemical oxygen demand, pH, and temperature in any wastewater generated by the facility. Any monitoring and measurements would be based on usage limits and flows associated with natural gas-fired plants.

Comment No. 8**Issue Code: 12**

9/21
The major criteria pollutant emissions and hazardous air pollutant emissions associated with the proposed project are identified in Tables 5.7-1 and 5.7-2 of the EIS. No polychlorinated biphenyls (PCBs) are generated from the proposed project.

10/16
Heavy metals emissions from the proposed facility are estimated to be 4.68 metric tons (5.16 tons) per year, or 93.6 metric tons (103.2 tons) over 20 years. Based on a very conservative screening analysis of heavy metals deposition, the resulting heavy metal deposition rate would be an average of 0.0375 kilograms per hectare (0.0335 pounds per acre) per year, or 37.5 grams per acre (0.54 ounces per acre) per year. Over a total of 20 years, the cumulative deposition of heavy metals would total an average of 0.75 kilograms per hectare (0.67

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Paris, KY
Page 5 of 5



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room. Six months or a year postparent
is nothing compared to the
decades this plant will be in place
and operating. This and future
generations will thank you.

yours,
Thomas M. Collins
Thomas M. Collins
320 Springhill Drive
Paris, Kentucky 40361

Please use other side if more space is needed.

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Comment No. 8 (cont.)

Issue Code: 12

pounds per acre), or 756.6 grams per hectare (10.7 ounces per acre). That quantity does not indicate any significant impacts from heavy metal deposition downwind of the proposed project.

Comment No. 9

Issue Code: 21

The Draft EIS is available to anyone who requests a copy. Additionally, copies are available in the project reading rooms at Trapp Elementary School and Clark County Public Library, as well as the Lexington Public Library.

10/16
(cont.)

Comment No. 10

Issue Code: 16

Comment noted. The NEPA process is designed to allow for adequate time to review and comment on NEPA documents. DOE believes the schedule for the Kentucky Pioneer IGCC Demonstration Project is sufficient to account for public comments and review. The public comment period was extended to January 25, 2002. DOE will consider all public comments before issuing the ROD. The ROD will be issued no sooner than 30 days after the Final EIS is distributed and a notice of availability is issued.